

**RADIOLOGIC TECHNOLOGY CERTIFICATION COMMITTEE (RTCC)
MEETING MINUTES**

May 2, 2012

**Ronald Reagan State Building
Building Auditorium
300 South Spring Street
Los Angeles, CA 90013**
Frieda Y. Taylor, M.S., Chairperson

COMMITTEE MEMBERS PRESENT

Roger S. Eng, M.D.	Johnson B. Lightfoote, M.D.
Todd D. Moldawer, M.D.	John L. Go, M.D.
Linda L. Ortega, CRT, (R) (CV), ARRT	Diane R. Garcia, M.S., CRT, RT (R) (CT)
Neil Mansdorf, DPM	Cliff Tao, DC
Dale Butler, MD	Michael L. Puckett, MD
Christopher H. Cagnon, Ph.D.	

COMMITTEE MEMBERS ABSENT

None

MEETING SUMMARY

I. CALL TO ORDER

Chairperson Frieda Y. Taylor, M.S. called the meeting to order at 9:00 a.m.

II. INTRODUCTIONS

Ms. Taylor introduced the RTCC members (Committee) and California Department of Public Health-Radiologic Health Branch (CDPH-RHB) staff in attendance. Also recognized were Melissa Martin, prior RTCC member (Medical Physicist) and Virginia (Ginny) Haselhuhn, Senior Director, Credentialing Operations, American Registry of Radiologic Technologists (ARRT).

III. APPROVAL OF OCTOBER 26, 2011 MINUTES

Minutes from the October 26, 2011 meeting were unanimously approved with no corrections.

Motion: Moldawer. Second: Lightfoote.

Ms. Taylor stated that the minutes would be published on the CDPH-RHB website within 30 days after the meeting.

IV. ANNOUNCEMENTS (Taylor)

- A) Expectation for meeting was to move forward with the Committee's recommendations and complete the rule-making process.
- B) Requested no new substantive proposals or changes be made to the draft regulations. Need to obtain the Committee's approval for draft proposals that will be discussed today.
- C) Venipuncture issues rose in October (*October 27, 2011 RTCC meeting*) are subject to proposed regulations and will be discussed briefly.

V. PROPOSED CHANGES TO RADIOLOGIC TECHNOLOGY (RT) ACT REGULATIONS (Phillip Scott, Senior Health Physicist, Regulations Unit)

INTRODUCTION/UPDATES

- A) Objective is move the regulations forward into the rule-making process based on Committee recommendations.
- B) Post-meeting will finish rule-making documentation for adoption of new regulations.
- C) Approval from Committee does not result in adoption of regulation – next step is to move to State legislatively mandated process for adopting regulations.
- D) One-year period to complete adoption processes once entered into rule-making process. During this time, there will be opportunity to review and comment.
- E) Changes to fees will not be included in this proposed regulations package. Additional analysis required.
- F) Anticipate package to be entered into rulemaking in mid-October.
- G) If approved, regulations should be effective January 2014.
- H) Possible delays due to reviews by other parties (i.e. Department of Finance, CDPH Director's Office, Agency). Public comment that requires substantive changes may cause additional delay.

CERTIFICATION/PERMITTING PROCESSES

§30400 (Definitions) - No updates from October 2011 meeting.

A) §30455.1 (Radiologic Technologist (RT) Applicants)

1. Must apply for certification in the three-years post-graduation.
2. Exceptions are current American Registry of Radiologic Technologists (ARRT) registrant or have passed the ARRT examination within the past five years.
3. Subject to Examination Limitation (§ 30407).

B) § 30451 (RT Fluoroscopy Applicants)

1. RTCC had recommended that Joint Review Committee on Education in Radiologic Technology (JRCERT) graduates who have passed the ARRT Radiography examination be qualified to take the fluoroscopy examination. This was rejected due to economic impact. Will be considered in future.
2. Must apply for certification and take/pass fluoroscopy examination in the three-years post-graduation.
3. Resume pathway eliminated.

C) § 30444 (Limited Permit X-Ray Technician Applicants (XT))

1. Must apply for certification and take/pass exam within three years post-graduation. .
2. Subject to Examination Limitation (§ 30407).

D) § 30407 (Examination Limitation)

1. Limits number of examination attempts for technologists and licentiates. No updates from October 2011 meeting.

E) § 30460 and 30466 – Licentiates

1. Update based on recommendation from Member Eng: Verified with American Board of Radiology (ABR) and American Osteopathic Board of Radiology (AOBR) that recommended processes were in line with their processes for certifying radiologists and oncologists.
2. American Chiropractic Board of Radiology (ACBR-DC) exempt from permit examinations for radiography and fluoroscopy.
3. X-ray Bone Densitometry - No updates from October 2011 meeting.
4. Scope of Authorization tied to healing arts license – No updates from October 2011 meeting.

F) § 30403 – Continuing Education (CE)

1. 4 CEs required in digital radiography (RT/XT).
2. 10 CEs required. 4 CEs required in Fluoroscopy. (Licentiates).
3. Removed 200 exam performance required for mammography renewal. Covered under the federal Mammography Quality Standards Act.
4. No updates from October 2011 meeting.

G) Discussion

1. Member Lightfoote requested reconsideration of factors regarding the potential negative economic impact of JRCERT graduates taking the fluoroscopy examination.
2. Discussion was held regarding upcoming changes to the American Board of Radiology (ABR) examination processes. (Members Eng, Go, Lightfoote)

3. Phillip Scott referenced page 79 of the regulations proposal clarified that if a candidate had passed either the ABR or American Board of Osteopathic Radiology (AOBR) examinations as identified in the proposal, CDPH-RHB would recognize this examination and a certificate would be issued. Under current regulations, any licentiate can apply for the radiology certificate. The proposed regulations ensure that the Supervisor and Operator Radiology Certificate are issued to those who practice as a radiologist or radiation oncologist.

RADIOLOGIC TECHNOLOGY SCHOOLS

A) §30411 – General Proposals

1. Update to 30411(f) – removed cohort limitation.

B) §30412 – Types of Schools/Application process

1. Two-Step Review to include (1) initial application review for school and all clinical affiliated sites (CAS) and (2) site inspection.
2. Approval to be valid for one year.

C) §30414 – Application Content

1. Deleted request for Medi-Cal numbers for CAS.
2. JRCERT accredited schools do not need to submit certain information to CDPH-RHB that has already been submitted to JRCERT.
3. Schools with in-house CAS do not need to submit an affiliate agreement.
4. Total number of students at site determined by applicant not to exceed calculated maximum.
5. Only XT programs need to submit the name of the lead supervising licentiate.

D) §30416 – Clinical Sites Outside of CDPH Jurisdiction

1. Refers to federal facilities or tribal facilities.
2. Deleted x-ray machine registration requirement.
3. Deleted proposal regarding sharing of clinical sites with other schools.
4. Deleted lead supervising licentiate information request.
5. Deleted radiation protection program language.
6. All CAS are subject to announced and unannounced inspections – authority as a State entity.

E) §30417 – Student Supervision at Clinical Sites

1. Comments from Fall 2011 meeting regarding medical and training aspects of students. Proposal addresses the responsibilities as they pertain to performing radiologic technology.

2. Comment received from Fall 2011 meeting regarding two-year experience requirement. This requirement will stand, similar to JRCERT. Can apply for a variance on a case-by-case basis.
- F) §30418 – Faculty Requirements (Program Director and Clinical Coordinator)
1. Program Director (PD) will be required to have a Master's Degree. Clinical Coordinator (CC) will be required to have a Bachelor's Degree. Degree types will not be specified.
 2. PD and CC must maintain certification or permit in X-ray.
 3. Current PD's will have until 2016 to complete Master's Degree.
 4. Probation-qualified practitioners will be allowed on a case-by-case basis for an exception or variance.
 5. Educational staff requirements are covered by JRCERT.
- G) §30419 – Program Director and Clinical Coordinator Responsibilities
1. No updates from October 2011 meeting.

10:15 A.M. – MORNING BREAK

10:33 A.M. – MEETING RECONVENED

RADIOLOGIC TECHNOLOGY SCHOOLS (CONTINUED)

- H) §30420 – Radiation Protection Program (RPP)
1. Comments from Fall 2011 meeting regarding Radiation Safety Officer (RSO) responsibilities:
 - a) An alternate RSO may be designated. Primary RSO maintains responsibility for oversight of tasks.
 - b) RSO duty includes reporting of student accidents and ensures school staff and students report events to CDPH-RHB.
 2. Deleted requirement to correlate student exposure to the clinical site.
- I) §30254 – Authority to Inspect
1. Inspectors may consult workers or students. Workers may bring attention to the inspector any conditions relating to radiation protection.
- J) §30255 – Posting Requirements
1. Violations must be posted for the period specified in the regulations.
 2. Must appear in an adequate number of places so worker can observe documents.
 3. Definition of “worker” – duties require or result in occupational exposure to radiation.
- K) §30295 – Notification of Incidents
1. Within four hours of an event and within 24 hours, and specifies what content must be reported.

L) Discussion

1. Nancy Perkins, Program Director, Bakersfield College requested clarification of the following:
 - a) Grandfathering of current program directors (page 23 of presentation). Is this through 2016 or indefinitely;
 - b) Qualifications of instructional staff for non-JRCERT schools. Should be further addressed.
 - c) Are schools required to keep all pages of a clinical site's RPP at their facility?
2. Jennifer Yates, Program Director, Merritt College requested clarification of 'notification of incidents.' Phillip Scott referenced §30295 and noted that various types of radiation or radioactive materials incidents were detailed along with correlating notification timeframes.
3. Anita Slechta, California State University, Northridge requested that reference be made to all non-JRCERT schools in California being required to abide by the same standards as JRCERT schools in regards to sharing of clinical sites
4. Phillip Scott noted that the version of the regulations that had been distributed for today's meeting would be updated with corrections and changes. Any recommendations for changes need to be sent to Phillip by the end of May 2012.
5. Member Cagnon: If American Society of Radiologic Technologists (ASRT) documents are being specified as curriculum for technologists, what is being cited for physicians? Phillip Scott: Curricula for physicians are found within the implementing laws under licensure laws for physicians, surgeons and osteopaths. All licentiates are required to pass an examination.
6. Nancy Perkins – Clinical affiliation agreements (§30417) – internal process typically would not involve the actual licentiate – would be "lawyer to lawyer." Member Lightfoote: Clinical affiliation agreement is signed between director of the school and COO of a hospital, for example. Licentiate would be required to comply but does not execute the actual agreement.

RADIOLOGIC TECHNOLOGY SCHOOLS PROPOSED CURRICULUM CHANGES

DIAGNOSTIC RADIOLOGIC TECHNOLOGY SCHOOL CURRICULUM

A) §30421 - Coursework

1. Deleted reference to ARRT content specifications.
2. Venipuncture
 - a. CDPH-RHB cannot give variances to existing law.
 - b. Senate Bill 1199 (SB 1199) (introduced Feb 22, 2012) As introduced - proposed that the 10 supervised venipunctures may be performed on a human or phantom extremity. SB 1199 was amended April 17, 2012.
 - c. Revised bill clarified that in administering contrast materials a radiologic technologist may, to ensure the security and integrity of the intravenous cannula, use a saline-based solution that is in accordance with hospital or imaging center protocol.
 - d. Current law states that schools are required to include venipuncture and confirm to CDPH-RHB by 2013 that it is included in curriculum.

THERAPEUTIC RADIOLOGIC TECHNOLOGIST SCHOOL CURRICULUM

A) §30422 – Coursework

1. Deleted reference to ARRT content specifications.
2. Will utilize ASRT curriculum requirements (most recent available).

FLUOROSCOPY RADIOLOGIC TECHNOLOGIST SCHOOL CURRICULUM

A) §30423 – Instruction and Training

1. Current requirements are 40-hours didactic and 15-hours laboratory.
2. Proposed change to 40-hours didactic and 40-hours clinical training (40/40).

DISCUSSION

- A) Current regulations do not assume that applicants for the Fluoroscopy examination has performed fluoroscopy procedures. To move forward with using the new ARRT fluoroscopy examination, requirements include specifics for procedures. (Phillip Scott)
- B) Intent of the “40/40” requirement was to focus on Physicians Assistants who have no background in radiation protection or radiation biology. (Ginny Haselhuhn, ARRT)

- C) A JRCERT accredited RT program will meet the 40/40 requirement. (Frieda Taylor)
- D) Recommendation of the Fluoroscopy Subcommittee was to go with JRCERT RT programs that have 40 hours of training already incorporated. (Melissa Martin, Fluoroscopy Subcommittee Chairperson)
- E) Phillip Scott confirmed that information regarding pending legislation (i.e. SB 1199) and the regulatory process could be found on the CDPH website, www.cdph.ca.gov.

LIMITED PERMIT X-RAY TECHNICIAN (XT) SCHOOLS – PROPOSED CURRICULUM CHANGES

- A) §30424 – Update from Fall 2011: Recommendation to create an Abdomen Permit category will not move forward at this time.
- B) §30427.2 - X-ray Bone Densitometry
 - Moving forward with recommendations from Fall 2011:
 - a. Programs must not be less than three days and no more than two months
 - b. Lab hours reduced from four hours to two, and to include quality assurance testing.
 - c. Deleted 10 extremity exams; added five forearms and five other exams.
 - d. Deleted On-the-Job training.
- C) Delete Gastrointestinal (GI) and Genitourinary (GU) categories.

Member Linda Ortega requested a motion to modify the recommendations from Fall 2011 regarding the deleting of the GU category and having GU become the Abdomen Permit category. Chairperson Taylor recommended that the members discuss the contents of the motion during lunch and to revisit immediately following the lunch break.

11:44 A.M. – LUNCH BREAK

1:20 P.M. – MEETING RECONVENED

LIMITED PERMIT X-RAY TECHNICIAN (XT) SCHOOLS – PROPOSED CURRICULUM CHANGES (CONTINUED)

- D) Motion –
 - 1. Move forward by eliminating the GI (gastrointestinal) permit category and change the GU (genitourinary) permit category to 'abdomen.'
(Member Ortega)
 - 2. Second (Member Mansdorf)

3. Motion passes – Yes (Moldawer, Eng, Lightfoote, Go, Butler, Puckett, Ortega, Garcia, Mansdorf, Tao) Abstain (Cagnon)
- E) Phillip Scott clarified in response to a question by Member Tao that the X-ray Bone Densitometry Licentiate certificate is for a specific bone densitometer which does not require user intervention for calibration, does not provide an image for diagnosis and is used only to estimate bone density of the heel, wrist or finger of the patient. In approximately 2000, a vendor requested an exemption from the RTCC which was declined. The vendor went to the legislature and a bill was subsequently passed. The number of individuals who are affected by this is very limited.
- F) Curriculum Changes:
1. Rejecting option to follow ASRT limited x-ray machine operator curriculum based on impact to schools and programs. The Initial Statement of Reasons will discuss alternatives considered.
 2. Extremity procedures to be split: 50/50 for upper and lower extremities. Based on the ASRT limited x-ray machine operator criteria.
 3. Programs cannot be less than three months.
 4. *Radiologic physics* hours increased to 20 hours.
 5. *X-Ray Technical Factors* renamed *Principles of Radiographic Exposure*. Hours increased to 30.
 6. *Equipment Operation and Care* renamed *Equipment Operation Quality Assurance and Control*.
 7. *Darkroom and Film* renamed *Image Processing* to incorporate digital imaging.
 8. *Nursing Procedures* renamed *Patient Care*. Hours increased to 10.
 9. *Film Critique* renamed *Image Evaluation*.
 10. *Anatomy and Physiology* – Hours increased to 20.
 11. *Pediatric and Geriatric Radiography* – Five hours.

DISCUSSION

- A) Member Mansdorf expressed concern regarding the effects of increase in hours on students and programs due to possible additional costs and undue financial burden to the students.
- B) Member Garcia, who was on the Limited Permit Subcommittee stated that she felt that the increase in hours is warranted as the additional education is in the best interest of the patient.
- C) Member Butler suggested that as new technological processes arise that require additional training, programs are looked at as a whole to determine if outdated processes should be dropped.

- D) Member Garcia stated that in the future XT programs might want to consider competency as opposed to processed based as educational programs are moving more towards processed based.
- E) Joe Melanson, Director, JEM College stated that he has written programs for numerous schools and his school and most others are already doing the additional hours. Mr. Melanson added that older technologies would continue to be taught, as people will continue to use them in physicians' offices that are not updating their equipment.
- F) Charles Peck, C-Dental X-ray, stated that per Article 4, pages 46 to 49, the proposed update of the subject matter terminology for limited permit x-ray technician schools shows that the RTCC is conscious of the need to educate technicians in digital dentistry. Cone beam computerized tomography (cone beam CT) machines have been registered with CDPH-RHB since 2001.
1. Phillip Scott referenced §30425, which was proposed in 2002 and reconfirmed in 2005. At that time, cone beam CT machines were not discussed.
 2. Member Garcia suggested additional education was needed in this area.
 3. Discussion was held regarding training of individuals using cone beam dental machines. Jerome Peck, C-Dental X-ray stated that his company wants to bring cone beam dental training into their curriculum. Member Garcia expressed concerns regarding radiation safety, overexposures and lack of regulations. Member Cagnon suggested that training could include how machines are set up, what dose they deliver, etc.
- G) Motion –
1. Regarding cone beam computerized tomography being used by dental x-ray laboratory technicians, that language be included in the proposed regulations regarding the physics and radiation output of these devices as part of the curricular background. (Member Cagnon)
 2. Amendment – Minimum number of procedures to be added (Member Lightfoote)
 3. Second – (Member Lightfoote)
 4. Motion passes unanimously.
 5. Chairperson Taylor requested that Jerry Peck email her information as to how the training component standard of a minimum amount of 100 procedures was determined.
- H) Phillip Scott clarified that while new dermatology supervisor and operator permits will not be issued; existing ones may continue to be renewed and therefore will be reflected in the regulations.

MAMMOGRAPHY RADIOLOGIC TECHNOLOGY SCHOOL CURRICULUM

- A) Based on concerns raised at the Fall 2011 meeting, the presented mammography RT school curriculum as proposed will not be moving forward.
- B) Existing §30455.1 to be modified to specify criteria for how to apply for and qualifications for a mammography certificate.
- C) Removed reference to existing regulations expiring July 1, 2000.
- D) Clarified that if an individual has an ARRT mammography certificate, do not need to take the California mammography examination. If have passed the ARRT mammography certification examination within the previous five years, do not need to take the California mammography examination.

OTHER ADMINISTRATIVE CHANGES

- A) Fees will not be included in this proposal.
- B) §30405 - Processing Deadlines and Timelines. Amended for clarity.
- C) §30435 – School Notifications to CDPH-RHB
 - 1. Striking language that is inconsistent with the proposed regulations.
 - 2. Clarifying “facility” as the school’s location.
 - 3. Changes in course offerings that no longer meet regulations.
 - 4. Change in program director or clinical coordinator.
 - 5. Change of affiliation agreement.
 - 6. No longer need names and addresses of students who have been dismissed, suspended or voluntarily withdrawn.
- D) §30436 – Standards for Suspension or Revocation of Approval
 - 1. Refers to violations of the Radiologic Technology Act.
 - 2. The number of graduates who pass examinations averaged over a five-year period must be at least 75%. This is to maintain consistency with JRCERT.
- E) §30437 – Additional School Requirements and Recordkeeping
 - 1. Discontinued schools do not need to surrender records or school approval certificate to CDPH-RHB.
- F) §30442 and 30443 – Limited Permit Categories and Scope
 - 1. To be updated to add new Abdomen permit category and scope
- G) §30404 – Providing Certificate or Permit to User
 - 1. Certificate/Permit holders must give a copy of certificate or permit to facility.
- H) §30403.8 – Record Retention
 - 1. Changes record retention requirement from five years to four years for continuing education documentation.
- I) Various non-substantial typographical and grammatical changes to be made including restructuring where certain regulations fall within index of California Code of Regulations, Title 17.

DISCUSSION

- A) Nancy Perkins, Bakersfield College asked for clarification regarding the new Fluoroscopy Examination implementation. Frieda Taylor stated that the examination is scheduled to start in January 2013. Notifications will be made to the schools in writing and the rollout will be specified, including study materials and content specifications.
- B) Phillip Scott clarified that current RT program directors would be grandfathered until January 1, 2016 in regards to the master's degree requirement. After that time, the requirement will be in place. Limited Permit X-ray technician schools program directors will be required to have a bachelor's degree by January 1, 2016.

VI. RECOGNITION

Phillip Scott was recognized by Nancy Perkins, Program Director, Bakersfield on behalf of all the schools for his hard work on the updating of the regulations over a period of decades.

VII. PUBLIC COMMENT PERIOD

VIII. CLOSING REMARKS

IX. NEXT MEETING DATE

October 30, 2012
1500 Capitol Avenue
Sacramento, CA 95814

X. MEETING ADJOURNED

(3:10 PM)